

REMARKS

In response to the Office Action mailed October 8, 2004, Applicants respectfully request reconsideration.

Applicants note in the Office Action Summary under item 12, no box has been checked indicating whether the certified copy of the priority documents has been received. As Applicants have already filed the certified copy of the priority application, Applicants respectfully request that the next Office Action confirm receipt of the certified copy of the priority document.

Claim 8 was objected to because of redundant claim language. In response to this objection, Applicants have deleted the redundant claim language and withdrawal of the objection is respectfully requested.

Claim 6 was rejected under 35 U.S.C. §112, second paragraph because it included the word "possible" which the Office Action deemed to be unclear and thus ignored. In response to this rejection, Applicants have deleted the word "possible" from claim 6 and believe that the claim is now clear enough to satisfy the statute. Applicants wish to note that this amendment is for clarification only and does not narrow the scope of claim 6.

Claims 1, 2, 5, and 6 were rejected under 35 U.S.C. §102(b) as being anticipated by Hadjiyiannis et al. Applicants respectfully disagree with this rejection. The Office Action asserts that Hadjiyiannis discloses at least "a descriptor file containing information descriptive of the instruction set of said target microprocessor" in section 1, paragraph c, lines 1-9 and also in Figure 1. However, this passage of Hadjiyiannis does not disclose a descriptor file. Instead it teaches that a retargetable compiler receives a machine description of the target processor (i.e. ISDL). That is, the purpose of Hadjiyiannis is that such a machine description takes on a specific format, which is ISDL and, as its name suggests, it is a computer language description. According to Hadjiyiannis, this particular computer language has advantages over other languages such as MIMOLA, CODESYN, CHESS, etc. (see Section II and the first four lines of Section VI). In particular, the advantage of this language ISDL as opposed to MIMOLA, for example, is that it is able to operate at a higher level and thus additionally provide support for explicit constraints (see paragraph 5 under Section II). Therefore, the ISDL description language of Hadjiyiannis is wholly different from the descriptor file as recited in claim 1. There is no

teaching or suggestion in Hadjiyiannis of a file or database containing information descriptive of the instruction sets. The ISDL description language includes six sections (see Section III, paragraph 4), which describes those descriptions along with their high level syntax definitions.

Clearly, from the above discussion, Hadjiyiannis does not teach or suggest a system for generating an assembler for a target microprocessor, the system comprising, *inter alia*, a descriptor file containing information descriptive of the instruction set of said target microprocessor. Claim 1 distinguishes over Hadjiyiannis and is in allowable condition. Accordingly, Applicants respectfully request the rejection of claim 1 under 35 U.S.C. §102 be withdrawn.

Claims 2-4 depend from claim 1 and are allowable for at least the same reasons.

Claim 5 recites a method of assembling a machine language program for a target microprocessor, comprising: providing a descriptor file containing information descriptive of the instruction set of said target microprocessor, translating assembly language instructions into machine language wherein the translation set comprises acquiring data from said descriptor file and constraining the machine language to conform to the architecture of said instruction set. As discussed above in connection with claim 1, Hadjiyiannis does not teach or suggest at least providing a descriptor file containing information descriptive of the instruction set of said target microprocessor. Accordingly, claim 5 distinguishes over Hadjiyiannis and is in allowable condition. Accordingly, Applicants respectfully request the rejection under 35 U.S.C. §102 be withdrawn.

Claim 6 depends from claim 5 and is allowable for at least the same reasons.

Claims 7 and 8 were rejected under 35 U.S.C. §103 over the combination of Hadjiyiannis and Vos. Applicants respectfully traverse this rejection.

Claim 7 recites a method of preparing a program executable on a target microprocessor comprising, *inter alia*, capturing data from the instruction set of said target microprocessor thereby forming a descriptor file containing information descriptive of said instruction set. As discussed above in connection with claim 1, Hadjiyiannis does not teach or suggest at least this limitation. Accordingly, no combination of Hadjiyiannis and Vos makes out a *prima facie* case of obviousness. Accordingly, claim 7 distinguishes over Hadjiyiannis and Vos, either alone or in

combination, and Applicants respectfully request that the rejection under 35 U.S.C. §103 be withdrawn.

Claim 8 recites a method of preparing a program executable on a microprocessor, comprising, *inter alia*, providing a descriptor file containing information descriptive of the instruction set of said target microprocessor. As discussed above in connection with claim 1, Hadjiyiannis does not teach or suggest at least this limitation. Accordingly, any combination of Hadjiyiannis and Vos fails to set forth a prima facie case of obviousness. Accordingly, claim 8 is in allowable condition and Applicants respectfully request that the rejection of claim 8 under 35 U.S.C. §103 be withdrawn.

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CONCLUSION

A Notice of Allowance is respectfully requested. The Examiner is requested to call the undersigned at the telephone number listed below if this communication does not place the case in condition for allowance.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 23/2825.

Respectfully submitted,

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